

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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SAUL COHEN,	:	Civil Action No.:
	:	
Plaintiff,	:	
	:	
vs.	:	<b>COMPLAINT</b>
	:	
CENTRAL CREDIT SERVICES, LLC,	:	
	:	
Defendant	:	

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Plaintiff, SAUL COHEN ("Plaintiff"), by and through his attorneys, Edward B. Geller, Esq., P.C., as and for its Complaint against the Defendant, CENTRAL CREDIT SERVICES, LLC (hereinafter referred to as "Defendant(s)"), respectfully sets forth, complains and alleges, upon information and belief, the following:

**INTRODUCTION/PRELIMINARY STATEMENT**

1. Plaintiff brings this action on his own behalf for damages and declaratory and injunctive relief arising from the Defendant's violation(s) of §1692 et seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA").

**PARTIES**

2. Plaintiff SAUL COHEN is a resident of the State of New Jersey, residing at 2 Treeside Lane, Lakewood, New Jersey 08701-5449.

3. Defendant CENTRAL CREDIT SERVICES, LLC is a Florida limited liability company with an address at 9550 Regency Square Boulevard, #500, Jacksonville, FL 32225.

4. The Plaintiff is a consumer as the phrase is defined in the FDCPA under 15 USC §1692a (3).

5. The Defendant is a "debt collector" as the phrase is defined and used in the FDCPA under 15 USC §1692a (6).

### **FACTUAL ALLEGATIONS**

8. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered "1" through "7" herein with the same force and effect as if the same were set forth at length herein.

9. Upon information and belief, Defendant, on behalf of a third-party, began efforts to collect an alleged consumer debt from the Plaintiff.

10. Upon information and belief, and better known to the Defendant, the Defendant began its collection efforts and campaign of communications with the Plaintiff on July 14, 2015 by writing to Plaintiff. A copy of Defendant's letter is attached hereto as Exhibit "A."

11. Defendant's letter stated that Toyota Motor Credit Corp. asked them to collect a balance from Plaintiff in the amount of \$3,543.35.

12. On August 3, 2015, Plaintiff placed a telephone call to Defendant and was connected to an unidentified female representative.

13. Plaintiff asked for Defendant's representative to break down the amounts which comprise the balance being sought of \$3,543.35.

14. Defendant's representative stated that Plaintiff owed a monthly payment of \$219.71, a late fee of \$10.99, a charge for wear and tear of \$378.00, a disposition fee of \$350.00, sales tax of \$275.13 and an excessive miles fee of \$3,202.50.

15. She thereafter stated that Plaintiff made a payment of \$434.24 which was subtracted from the balance due.

16. Plaintiff stated that he disputed the amount of the balance and the call concluded.

**FIRST CAUSE OF ACTION**  
***(Violations of the FDCPA)***

17. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered "1" through "16" herein with the same force and effect as if the same were set forth at length herein.

18. 15 USC §1692 e – preface and e (10) prohibits the use of any false, deceptive or misleading representations in connection with the collection of a debt.

19. Defendant violated 15 USC §1692 e – preface and e (10) when Defendant sent Plaintiff a notice asking him to pay a balance due of \$3,543.35, but when Plaintiff placed a telephone call to Defendant, Defendant's representative recited a list of charges which, after a payment Plaintiff made had been deducted, added up to \$4,436.33. Defendant deceptively wrote to Plaintiff misleading him about the amount the creditor was demanding.

20. 15 USC §1692 f – preface prohibits a debt collector from using any unfair or unconscionable means in connection with the collection of a debt.

21. The Defendant violated 15 USC §1692 f preface by unfairly misrepresenting a balance due to a creditor as lower than the actual amount due which, according to a representative of Defendant, is approximately \$893 more than Defendant's collection letter claims. In the event the creditor chooses to file a lawsuit for collection, Plaintiff would,

according to Defendant's representative's information to Plaintiff on August 3, 2015, be unfairly charged with owing a significant increase than his understanding of what was due.

22. As a result of Defendant's violations of the FDCPA, the Plaintiff has been damaged and is entitled to damages in accordance with the FDCPA.

**DEMAND FOR TRIAL BY JURY**

23. Plaintiff hereby respectfully requests a trial by jury for all claims and issues in its Complaint to which it is or may be entitled to a jury trial.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff demands judgment from the Defendants as follows:

- A. For actual damages provided and pursuant to 15 USC §1692k (a) (1);
- B. For statutory damages provided and pursuant to 15 USC §1692(2)(A);
- C. For statutory damages provided and pursuant to 15 USC§1692k(2)(B);
- D. For attorneys' fees and costs provided and pursuant to 15USC§1692(a) (3);
- E. A declaration that the Defendant's practices violated the FDCPA;
- F. For any such other and further relief, as well as further costs, expenses and disbursements of this action, as this Court may deem just and proper.



Dated: August 18, 2015

Respectfully submitted,



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EDWARD B. GELLER (EG9763)  
EDWARD B. GELLER, ESQ., P.C.  
15 LANDING WAY  
BRONX, NEW YORK 10464  
TEL:(914)473-6783  
*Attorney for the Plaintiff SAUL COHEN*

To: Central Credit Services, LLC  
9550 Regency Square Boulevard, #500  
Jacksonville, FL 32225

*(Via Prescribed Service)*

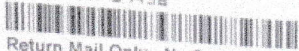
Clerk of the Court,  
United States District Court, District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street Room 2020  
Trenton, New Jersey 08608

*(Via Electronic Court Filing)*

**EXHIBIT "A"**



P.O. Box 1259, Dept. #119195  
Oaks, PA 19456

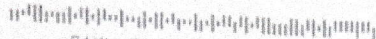


Return Mail Only - No Correspondence or Payments

**CENTRAL CREDIT SERVICES LLC**

P.O. BOX 15118  
JACKSONVILLE, FL 32239-5118  
(877) 456-1106

MONDAY-THURSDAY 8AM-9PM, AND FRIDAY 8AM-5PM  
EASTERN STANDARD TIME



SAUL COHEN  
2 TREESIDE LN  
LAKEWOOD NJ 08701-5449

Central Credit #: 8669020

July 14, 2015

**Current Creditor:** TOYOTA MOTOR CREDIT CORP  
**Account:** 80002922159100001  
**Balance:** \$3,543.35

Please be advised that TOYOTA MOTOR CREDIT CORP has asked our office to work with you to resolve the above referenced account. According to TOYOTA MOTOR CREDIT CORP records, your leased vehicle was returned and your account balance may consist of one or more of the following charges: unpaid lease charges, mileage and/or wear and use over and above that allowed by your lease agreement. If you are unable to remit the balance of your account, we kindly ask that you contact our office so we can assist you in the repayment of your account. The preceding information does not affect your rights set forth below.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Sincerely,

Central Credit Services

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained shall be used for that purpose. Calls to or from this company may be monitored or recorded for quality assurance.

Please Detach And Return in The Enclosed Envelope With Your Payment

**Balance:** \$3,543.35

**Amount Enclosed:** \$ \_\_\_\_\_

Date: July 14, 2015

Central Credit #: 8669020

Toll Free #: (877) 456-1106

SAUL COHEN  
2 TREESIDE LN  
LAKEWOOD NJ 08701-5449

Central Credit Services LLC  
P.O. Box 15118  
Jacksonville, FL 32239-5118

